

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v

Case No. 2:19-cv-10750

Hon. Paul D. Borman

Mag. Judge Stephanie Dawkins Davis

DAMIAN JACKSON, et al,

Defendants.

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JAMES STRANDJORD  
U.S. Department of Justice  
Tax Division  
P.O. Box 55  
Ben Franklin Station  
Washington, DC 20044-0055  
202-616-3345  
james.m.strandjordan@usdoj.gov

DAMIAN & HOLLY JACKSON  
*In pro per*  
33160 Wendy Drive  
Sterling Heights, MI 48310  
313-492-8618  
586-864-0297

FRANK KRYCIA (P35383)  
Asst. Macomb County  
Corporation Counsel  
Attorney for Defendant Macomb  
County  
One S. Main Street, 8<sup>th</sup> Floor  
Mount Clemens, MI 48043  
(586) 469-6346  
frank.krycia@macombgov.org

STEVEN A. JACOBS (P68749)  
Schneiderman & Sherman, P.C.  
Attorney for Defendant Sabo  
23938 Research Dr., Ste. 300  
Farmington Hills, MI 48335  
248-539-7400  
sjacobs@sspclegal.com

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DEFENDANT MACOMB COUNTY'S  
ANSWER

Defendant Macomb County, through its counsel, Macomb County

Corporation Counsel, by Frank Krycia, Assistant Corporation Counsel, in answer to the Complaint states:

1. Defendant admits that this Court has jurisdiction.
2. Defendant neither admits nor denies the allegations in paragraph two of the Complaint for lack of information and leaves the Plaintiff to its proofs.
3. Defendant neither admits nor denies the allegations in paragraph three of the Complaint for lack of information and leaves the Plaintiff to its proofs.
4. Defendant neither admits nor denies the allegations in paragraph four of the Complaint for lack of information and leaves the Plaintiff to its proofs.
5. Defendant neither admits nor denies the allegations in paragraph five of the Complaint for lack of information and leaves the Plaintiff to its proofs.
6. Defendant neither admits nor denies the allegations in paragraph six of the Complaint for lack of information and leaves the Plaintiff to its proofs.
7. Defendant admits the allegations in paragraph seven of the Complaint.

8. Defendant neither admits nor denies the allegations in paragraph eight of the Complaint for lack of information and leaves the Plaintiff to its proofs.

9. Defendant admits the allegations in paragraph nine of the Complaint but notes that the property's address is 33160 Wendy Drive, Sterling Heights, MI.

### COUNT I

10. Defendant repeats the prior responses.

11. Defendant neither admits nor denies the allegations in paragraph eleven of the Complaint for lack of information and leaves the Plaintiff to its proofs.

12. Defendant neither admits nor denies the allegations in paragraph twelve of the Complaint for lack of information and leaves the Plaintiff to its proofs.

13. Defendant neither admits nor denies the allegations in paragraph thirteen of the Complaint for lack of information and leaves the Plaintiff to its proofs.

14. Defendant neither admits nor denies the allegations in paragraph fourteen of the Complaint for lack of information and leaves the Plaintiff to its proofs.

## COUNT II

15. Defendant repeats the prior responses.

16. Defendant neither admits nor denies the allegations in paragraph sixteen of the Complaint for lack of information and leaves the Plaintiff to its proofs.

17. Defendant neither admits nor denies the allegations in paragraph seventeen of the Complaint for lack of information and leaves the Plaintiff to its proofs.

18. Defendant neither admits nor denies the allegations in paragraph eighteen of the Complaint for lack of information and leaves the Plaintiff to its proofs.

19. Defendant neither admits nor denies the allegations in paragraph nineteen of the Complaint for lack of information and leaves the Plaintiff to its proofs.

20. Defendant neither admits nor denies the allegations in paragraph twenty of the Complaint for lack of information and leaves the Plaintiff to its proofs.

## COUNT III

21. Defendant repeats the prior responses.

22. Defendant neither admits nor denies the allegations in

paragraph twenty-two of the Complaint for lack of information and leaves the Plaintiff to its proofs.

23. Defendant neither admits nor denies the allegations in paragraph twenty-three of the Complaint for lack of information and leaves the Plaintiff to its proofs.

24. Defendant neither admits nor denies the allegations in paragraph twenty-four of the Complaint for lack of information and leaves the Plaintiff to its proofs.

25. Defendant neither admits nor denies the allegations in paragraph twenty-five of the Complaint for lack of information and leaves the Plaintiff to its proofs.

26. Defendant neither admits nor denies the allegations in paragraph twenty-six of the Complaint for lack of information and leaves the Plaintiff to its proofs.

#### COUNT FOUR

27. Defendant repeats the prior responses.

28. Defendant neither admits nor denies the allegations in paragraph twenty-eight of the Complaint for lack of information and leaves the Plaintiff to its proofs.

29. Defendant neither admits nor denies the allegations in

paragraph twenty-nine of the Complaint for lack of information and leaves the Plaintiff to its proofs.

30. Defendant neither admits nor denies the allegations in paragraph thirty of the Complaint for lack of information and leaves the Plaintiff to its proofs.

31. Defendant neither admits nor denies the allegations in paragraph thirty-one of the Complaint for lack of information and leaves the Plaintiff to its proofs.

32. Defendant neither admits nor denies the allegations in paragraph thirty-two of the Complaint for lack of information and leaves the Plaintiff to its proofs.

33. Defendant neither admits nor denies the allegations in paragraph thirty-three of the Complaint for lack of information and leaves the Plaintiff to its proofs.

#### COUNT FIVE

34. Defendant repeats the prior responses.

35. Defendant neither admits nor denies the allegations in paragraph thirty-five of the Complaint for lack of information and leaves the Plaintiff to its proofs.

36. Defendant admits the allegations in paragraph thirty-six of the

Complaint.

37. Defendant admits the allegations in paragraph thirty-seven of the Complaint.

38. Defendant neither admits nor denies the allegations in paragraph thirty-eight of the Complaint for lack of information and leaves the Plaintiff to its proofs.

#### COUNT SIX

39. Defendant repeats the prior responses.

40. Defendant neither admits nor denies the allegations in paragraph forty of the Complaint for lack of information and leaves the Plaintiff to its proofs.

41. Defendant neither admits nor denies the allegations in paragraph forty-one of the Complaint for lack of information and leaves the Plaintiff to its proofs.

42. Defendant neither admits nor denies the allegations in paragraph forty-two of the Complaint for lack of information and leaves the Plaintiff to its proofs.

43. Defendant admits the allegations in paragraph forty-three of the Complaint.

44. Defendant admits the allegations in paragraph forty-four of the

Complaint.

45. Defendant neither admits nor denies the allegations in paragraph forty-five of the Complaint for lack of information and leaves the Plaintiff to its proofs.

WHEREFORE, Defendant, the County of Macomb, requests this Court to dismiss Defendant from this action and to grant Defendant further relief in accordance with the law and is fair and just.

/s/ Frank Krycia  
FRANK KRYCIA (P35383)  
Macomb County Assistant  
Corporation Counsel

DATED: May 9, 2019